

REMARKS

This amendment is in response to the Official Action mailed January 19, 2006.

In the present paper, Applicants have amended claims 1, 11, 21 and 22. Claims 1-5, 7-15 and 17-26 are presented for the Examiner's consideration in view of the following remarks:

The Present Application

The present application is directed to a call processing center capable of accepting calls from a plurality of disparate telecommunications networks. Specifically, agent availability information is shared among the disparate networks through an Agent Availability Network Control Point (AANCP) that may reside in the call processing center (present spec., p. 6, lines 3-17). The AANCP contains an I/O module that interfaces with each disparate telecommunications network (p. 6, line 18 – p.7, line 1).

The inventors have discovered a technique whereby agents, each within each of several disparate networks, have their availability tracked by the AANCP. The AANCP therefore tracks agent availability among multiple disparate caller networks without becoming being involved in connecting calls between the caller networks and an "agent network." Instead, the agents are themselves connected to each disparate network.

The Examiner has rejected claims 1, 2, 4, 5, 7,-12, 14, 15 and 17-26 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,614,783 to Sonesh et al. ("Sonesh"), has rejected claims 5 and 15 under 35 U.S.C. § 103(a) as unpatentable over Sonesh, and has rejected claims 3 and 13 under 35 U.S.C. § 103(a) as unpatentable over Sonesh in view of U.S. Patent No. 5,987,116 to Petrunka et al. ("Petrunka ").

Discussion

Applicants respectfully assert that, for the reasons stated below, the claims as amended are not anticipated by or obvious over the cited art because each and every limitation of the independent claims is not found those references

The Sonesh Patent Does Not Teach Agents within Disparate Networks

A feature of the present invention is the ability to connect a caller to an agent within the caller's network, while taking into consideration whether the agent is busy with a caller in another, disparate network. There is no need to translate or convert from one network protocol to another. Instead, the agent has a direct interface with each of the disparate networks (present application, page 6, line 18 – page 7, line 1).

For example, a caller 2 in a switched network 14 is connected directly to an agent 35 through LEC 20 (present application, FIG. 2; p. 7, line 11 – page 8, line 3). Similarly, a caller 3 in an ATM network 7 may be connected to the agent 35 directly through ATM router 8 (FIG. 2; page 8, lines 4-13). A caller 4 in an IP network 11 is given an Internet address for connecting to the agent 35 in the IP network (page 8, line 14 – page 9, line 3). In each case, the agent is within the caller's network and can therefore be directly connected to the caller.

In sharp contrast, the system taught by Sonesh is required to translate or convert calls from the callers' networks to the IP network in which the agents are connected:

In case of PSTN audio only access by caller 104, the audio signal is converted by MMACD server 110 to digital information which is compressed and then packetized using protocols such as DOD

Internet Protocol ("IP") specifications. For audio only access, the caller is presented by audio menus which he navigates by means of pressing buttons on his telephone set sending dual tone multi-frequency ("DTMF") tones. Navigation by means of voice recognition is also possible.

Sonesh, col. 5, lines 56-64.

Claim 1, as amended, requires that the agent be "within" each disparate telecommunications network, and that the call be connected to the determined agent "within the one telecommunications network, the one telecommunications network being a circuit-switched network" (the "one" telecommunications network, according to the claim, being the network from which the query regarding agent availability was received). No such arrangement is taught by Sonesh; instead, circuit switched calls must be converted for entry into the IP network 113 (FIG. 1; col. 5, lines 56-64).

Applicant therefore submits that amended claim 1 is novel because Sonesh does not disclose an agent "within" a circuit-switched network from which the agent availability query is received. Applicant further submits that claims 2-5 and 7-10, which depend from claim 1, are patentable for at least the same reason.

Independent claims 11 and 21 have been amended to contain limitations similar to those added to claim 1. Claims 11 and 21, together with the claims depending from those claims, are therefore submitted to be patentable for at least the same reasons.

Independent claim 22 has been amended to require that "each agent [is] within each said disparate telecommunications network." No such arrangement is disclosed by Sonesh. Instead, the agents 120 are within only the Internet 113, and the agent 121 is within only the "data network internet" 112 (see Sonesh, FIG. 1). No agent is disclosed to be within more than one

disparate network. In contrast, the agent IO module 41 of the present invention has interfaces to ATM, circuit switched and IP networks (present application, FIG. 4; page 6, lines 18-19).

Conclusion

Applicant therefore respectfully asserts that all the claims in the case are now in condition for allowance, and earnestly request that the Examiner issue a Notice of Allowance.

Should the Examiner have any questions regarding the present case, the Examiner should not hesitate in contacting the undersigned at the number provided below.

Respectfully submitted,

By



Robert T. Canavan

Reg. No. 37,592

Telephone: 908-707-1568

Canavan & Monka LLC
250 State Route 28, Suite 207
Bridgewater, NJ 08807

Date:

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